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December 17, 2023

APPLICATION GRANTED

SO ORDERED


VERNON S. BRODERICK

U.S.D.J. 12/18/2023

By ECF

The Honorable Vernon S. Broderick
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square, Room 415
New York, New York 10007

Re: Al Ghanem v. Black Diamond Commercial Finance, LLC, 23-cv-10187-VSB

Dear Judge Broderick:

On behalf of defendants IAP Worldwide Services, Inc. and IAP Global Services, LLC (together, “IAP”), I respectfully submit this letter motion to request that the Court permit IAP to temporarily file under seal IAP’s Response to Plaintiff’s Motion for Permanent Injunction in its entirety.

In the interest of efficiency, I refer the Court to the letter motion of defendant Black Diamond Commercial Finance, LLC (“BDCF”) filed earlier today seeking the same relief (ECF No. 70), which the Court has granted. The subject matter of IAP’s Response is the same as the subject matter of BDCF’s papers, the grounds for keeping certain information therein confidential are the same as for BDCF’s papers, and the applicable precedent is the same as that cited by BDCF.

Accordingly, on behalf of IAP, I respectfully request that IAP’s Response to Plaintiff’s Motion for Permanent Injunction be permitted to be temporarily filed under seal in its entirety, pending the parties meeting and conferring regarding proposed redactions. IAP, like BDCF, commits to promptly reverting to the Court with proposed redacted versions of these documents that can be publicly filed.

Respectfully submitted,

/s/ Joshua Dorchak

Joshua Dorchak